

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

SUZANNE HICKS,	)	
	)	Civil Action No.
Plaintiff,	)	
	)	1:14-cv-01729-ODE
v.	)	
	)	
CARROLL MANAGEMENT GROUP,	)	
LLC AND MICHAEL PATRICK	)	
CARROLL,	)	
	)	
Defendants.	)	
<hr style="width: 40%; margin-left: 0;"/>	)	

**JOINT MOTION FOR ENTRY OF A CONSENT PROTECTIVE ORDER**

Defendants Carroll Management Group, LLC and Michael Patrick Carroll and Plaintiff Suzanne Hicks jointly move this Court, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, for the entry of the attached Consent Protective Order. Plaintiff and Defendants have consulted and executed the Consent Protective Order, which will facilitate the proceedings in this litigation by protecting against the unnecessary or unauthorized disclosure of information and data the parties regard as confidential or proprietary.

### **CITATION OF AUTHORITY**

Parties may stipulate to the entry of a protective order to protect the party or other person against annoyance, embarrassment, oppression, or undue burden or expense. *See* Fed. R. Civ. P. 26(c); 6 James W. Moore *et. al.*, *Moore's Federal Prac.* §29.04[3] (3d Ed. 1997).

A court is authorized to make any order that justice requires to protect a person or party from annoyance, embarrassment, oppression, or undue burden or expense. 6 James W. Moore *et. al.*, *Moore's Federal Prac.* §26.105[1][b]. Consent protective orders, such as the one submitted by the parties in this case, help avoid the expense and delay of a dispute over every item of allegedly confidential information, thereby permitting the overriding goal of the Federal Rules of Civil Procedure “to secure the just, speedy and inexpensive determination of every action.” 6 James W. Moore *et. al.*, *Moore's Federal Prac.* §26.104[2] (3d Ed. 1997) (*citing In Re: Alexander Grant & Company Litigation*, 820 F.2d 352, 356-357 (11th Cir. 1987)).

WHEREFORE, Plaintiff and Defendants jointly request that this Court grant this Motion and enter the attached proposed Consent Protective Order governing the disclosure of confidential information or documents, protecting qualified

persons with access to confidential information, and imposing restrictions on the use and disclosure of confidential information.

Respectfully submitted this 17<sup>th</sup> day of October, 2014.

*s/ Deepa N. Subramanian*

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CARROLL MANAGEMENT GROUP,	)	
LLC AND MICHAEL PATRICK	)	
CARROLL,	)	
	)	
Defendants.	)	
_____	)	

**CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing JOINT MOTION FOR ENTRY OF A CONSENT PROTECTIVE ORDER has been filed this day using the Court's CM/ECF system, which will automatically serve a copy of same upon the following counsel of record via e-mail:

Elizabeth Brown  
Benjamin Barrett  
Amanda Farahany  
Barrett & Farahany, LLP  
*Counsel for Plaintiff*

This 17th day of October, 2014.

s/Deepa Subramanian  
Counsel for Defendants